

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

MAURICE JAMES SJOBLOM, on behalf
of himself and a class of employees and/or
former employees similarly situated,

Plaintiff,

v.

Case No.: 07-C-0451-C

CHARTER COMMUNICATIONS, LLC,
AND CHARTER COMMUNICATIONS
(CCI), INC. (Fict Name), A/K/A
CHARTER COMMUNICATIONS, INC.
(Corp Name),

Defendants.

**AGREED MOTION FOR PRELIMINARY APPROVAL OF PROPOSED
SETTLEMENT, CONDITIONAL CLASS CERTIFICATION, AND
APPROVAL OF CLASS NOTICE PROGRAM AND FORM OF CLASS NOTICE
AND CLAIM, WAIVER, AND RELEASE FORM**

For the reasons explained in the memorandum of law filed herewith, the Parties move this Court to enter an Order: (1) asserting jurisdiction over the claims and parties alleged in Plaintiff's Third Amended Complaint and administration of the Parties' proposed Stipulation and Settlement Agreement ("Settlement Agreement"); (2) granting preliminary approval of the Parties' proposed Settlement Agreement; (3) conditionally certifying the Wisconsin State Law Rule 23 class defined in the Parties' Settlement Agreement for settlement purposes only; (4) appointing Maurice James Sjobjlom as settlement class representative; (5) approving the Class Notice and class Claim, Waiver, and Release Form ("Claim Form") attached as Exhibits 2 and 3 to the Parties' proposed Settlement Agreement and authorizing mailing of same to members of the Settlement Classes; (6) appointing as class counsel Gingras, Cates & Leubke, S.C. and Axley Brynelson, LLP; (7) appointing Rust Consulting Services, Inc. as the settlement claims

administrator; (8) setting a date for the execution and return of claim forms and filing of objections or opting out of the settlement; and (9) scheduling a hearing as the Court's calendar permits for the final approval of the Parties' proposed Settlement Agreement and entry of a final order dismissing with prejudice all claims encompassed by such agreement.

WHEREFORE, for the reasons explained in the attached memorandum of law and supporting exhibits thereto and in the supporting declarations, the Parties request that their Agreed Motion for Preliminary Approval of Proposed Settlement, Conditional Class Certification, and Approval of Class Notice Program and Form of Class Notice and Claim, Waiver, and Release Form be granted, and that the proposed order attached hereto as Exhibit A be entered on the docket.

Respectfully submitted this 20th day of August, 2008.

MAURICE JAMES SJOBLOM,
on behalf of himself and a class
of employees and/or former employees
similarly situated,

By: s/ Michael J. Modl (with consent)
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